

From: [Stephanie Fong](#)
To: [Delta Plan Comments@Deltacouncil](#)
Cc: [Jerry Bruns](#); [Ken Landau](#); [Pamela Creedon](#)
Subject: 2nd Draft Delta Plan comments from Central Valley Regional Water Board
Date: Friday, April 15, 2011 3:40:44 PM

Thank you for the opportunity to provide comments on the second staff draft Delta Plan. We appreciate the support for our TMDL program that is embodied in WQP1. In addition, the Water Quality Recommendations suggested in the second draft are all things that are a high priority to the Regional Board. We have a suggestion for an addition to the draft Water Quality Recommendations section. We have been working with other agencies and programs to develop a comprehensive Delta Regional Monitoring Program. It would be helpful if your Delta Plan could endorse this concept and include a recommendation that it is important for us to keep working on this. We suggest the following language for your consideration.

WQP2 - The State Water Resources Control Board and Regional Water Quality Control Boards should work collaboratively with the Department of Water Resources, Department of Fish and Game and other agencies and entities that monitor water quality in the Delta to develop and implement a Delta Regional Monitoring Program that will be responsible for coordinating monitoring efforts so Delta conditions can be efficiently assessed on a regular basis.

We also have a suggestion for an addition to the Water Quality Recommendations section. The draft plan contains various elements aimed at encouraging wise and efficient use of water resources. It might be useful to specifically indicate that one way of doing that is to take steps that would lead to reductions in the loads of contaminants from waste discharges entering the Delta. Discharges from urban areas and discharges from wastewater treatment plants are currently required to meet permit requirements that are aimed at protecting Delta waters from known problem contaminants. Unfortunately, these discharges contain a complex array of contaminants, many of which do not have defined safe levels. Reducing the volume of discharges is one way of reducing the risk to the environment and finding another useful use for the discharges is consistent with encouraging wise and efficient use of water. Reducing the contaminants in the discharge is another way of reducing risk. Typical BMPs can be used in new ways to reduce contaminants that cannot yet be identified. We suggest the following language for your consideration.

WQR9 - The Central Valley Regional Water Quality Control Board, consistent with existing Water Quality Control Plan policies and Water Rights law, should require responsible entities that discharge wastewater treatment plant effluent or urban runoff to Delta waters to evaluate whether all or a portion of the discharges can be recycled or otherwise used in order to reduce contaminant loads to the Delta.

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In order to comply with the Governor's call for furloughs, the Central Valley Regional Water Quality Control Board offices and offices of the California Environmental Protection Agency are closed the second, third, and fourth Friday of every month. I apologize for any inconvenience this may cause.